

REMARKS

Claims 1-91 are pending in the application. Claims 28, 29, 38-66, 77-80 and 90 previously have been withdrawn. Claims 6-18, 27, 68-76 and 86-87 are allowed. Claims 19-21 and 85 are objected to as depending from a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. Claims 1-5, 22-26, 30-37, 67, 81-84, 89 and 91 stand rejected.

Claims 10, 12, and 88 are indicated as being allowable if rewritten to overcome the rejection under 35 USC §112, second paragraph and to include all the limitations of the base claim and any intervening claims. However, no rejections under 35 USC §112, second paragraph have been provided for these claims. The Applicant assumes this is a typographical error and that claims 10, 12 and 88, which depend from allowed claims 6, 11 and 86, respectively, also are allowed.

Claims 19 and 85 have been rewritten in independent form including all the limitations of the base claim and any intervening claims and thus should be allowable. Claims 20-21 depend from independent claim 19 and therefore also should be allowable. Claims 81-84 have been canceled herein. Claim 37 has been amended to correct a typographical error.

A fee for one additional independent claim is included herewith.

Favorable reconsideration of the application is respectfully requested.

I. TELEPHONE INTERVIEW

Applicants wish to thank the Examiner for taking the time to conduct a telephone interview with the undersigned on July 27, 2004. The interview was helpful in identifying the respective positions of the Examiner and the Applicant.

**II. REJECTION OF CLAIMS 22-25, 30-32, 37, 67, 81-84, 89 AND 91
UNDER 35 USC §102(b)**

a. Claims 22-25

Claims 22-25 stand rejected under 35 USC 102(b) as being anticipated by U.S. Patent No. 4,422,137 to *Watts*. Withdrawal of the rejection is respectfully requested for at least the following reasons.

Claim 22 recites a fixture installation and removal tool that includes a base, a rod attachment means integrally formed within the base, and a coupling means extending from the base at an angle to the rod attachment means. Figs. 17 and 18 illustrate an embodiment of a fixture installation and removal tool 703, which includes a base 718a, a rod attachment means (e.g., socket 718b) integrally formed within the base, and a coupling means 717 extending from the base.

The Examiner contends that *Watts* discloses a coupling means as recited in claim 22 of the present application, and identifies the magnets 22 as the coupling means. Referring to Figs 2 and 3 of *Watts*, the magnets 22 are shown coupled to a base 18. The base 18, as referred to in *Watts*, includes a top wall 17 and rim 20.¹ Moreover, the magnet 22 is completely below the rim 20 of the base 18 and, therefore, does not extend from the base. *Watts* does not disclose a coupling means extending from the base, as recited in claim 22 of the present application.

Accordingly, withdrawal of the rejection of claim 22 is respectfully requested.

Claims 23-25 depend from claim 22 and therefore can be distinguished from *Watts* for at least the same reasons.

Claim 23 further recites that the base is a T-base. The Examiner contends that *Watts* discloses a base that includes a T-base, but does not provide a cite or a particular figure in *Watts* that shows a T-base. The undersigned has performed a word search for the term "T-base" (and various forms thereof, e.g., Tee-base, T base, etc.)

¹ See column 2, lines 41 of *Watts*, which define the base 18

and was not able to locate the term in *Watts*. The undersigned assumes that the Examiner has interpreted the base 18 shown in Fig. 3 of *Watts*, which is a side view of the base, to be a T-base. The Applicant respectfully submits that the base of Fig. 3 is a *side view of a circular base*, and not a T-base. Fig. 2 of *Watts* illustrates an isometric view of the base, where it clearly can be seen that the base is circular, and not a T-base. *Watts* does not teach or suggest a T-base as recited in claim 23 of the present application.

Claim 24 further recites that the rod attachment means is a threaded receptacle. As can be seen in Fig. 18, a rod 720 having a threaded end is inserted into the rod attachment means, e.g., the receptacle 718b, which also is threaded. The threaded connection provides a secure attachment between the rod and the base, without the need for additional components. The Examiner contends that *Watts* discloses a rod attachment means that is a threaded receptacle, but does not provide a cite or a figure in *Watts* that discloses this feature.

Referring to Figs. 2 and 3 of *Watts*, an aperture 25 is shown. Figs 2 and 3, however, do not show threads on the aperture. Moreover, nowhere has it been shown that the disclosure states that the aperture is threaded. *Watts* simply discloses that the threaded end of the support shaft 12 is inserted into the aperture 25, and *a nut is fixed to the shaft 12 to hold the shaft and the base together.*² *Watts* does not teach or suggest a rod attachment means that is a threaded receptacle, as recited in claim 24 of the present application.

Claim 25 further recites that the rod attachment means includes a locking screw. With reference to the embodiment of Figs. 17 and 18, a locking screw 719b is shown coupled to the rod attachment means 718b. As a rod 720 is inserted into the rod attachment means, the locking screw 719b is turned so as to contact the rod, thereby locking the rod to the rod attachment means.

The Examiner contends that *Watts* discloses a rod attachment means that includes a locking screw, and specifically refers to the locking washer 30. The

²See column 2, line 55-column 3, line 4

Applicant respectfully submits that a locking washer is not a locking screw. Nowhere has it been shown that *Watts* teaches or suggests a rod attachment means that includes a locking screw, as recited in claim 25 of the present application.

Accordingly, withdrawal of the rejection of claims 23-25 also is respectfully requested.

b. Claims 30-32, 37, 67, 81-84, 89, and 91

Claims 30-32, 37, 67, 81-84 and 91 stand rejected under 35 USC 102(b) as being anticipated by U.S. Patent No. 5,478,256 to *Koganemaru at al.* (hereinafter *Koganemaru*). Withdrawal of the rejection is respectfully requested for at least the following reasons.

i. Claims 30-32

Claim 30 recites a fixture mounting system that includes a first relatively fixed part having a retention mechanism, a second part, and a tool for temporarily coupling with respect to the second part. The tool facilitates positioning of the second part with respect to the first part. For example, the tool is coupled to the second part, and the tool is used to register the second part with respect to the first part, which may be remotely located, e.g., on a high ceiling or wall. A latch retains the tool and the second part together, and the latch releases in response to positioning of the second part with respect to the first part.

In the response to the previous Office Action, Applicant argued that claims 30-32 are distinguishable from *Koganemaru*, since *Koganemaru* discloses that a separate bar is used to disengage the detector unit from the base. In the present Office Action, the Examiner states that it is irrelevant whether a bar is used to move the latch from engagement to disengagement.³ The Applicant respectfully disagrees with the Examiner. Claim 30 clearly recites that the latch releases in response to positioning of the second part with respect to the first part. Thus, the fact that *Koganemaru* discloses that a bar must be inserted to disengage the latching mechanism is relevant.

³Page 6, last paragraph of Office Action

Koganemaru discloses a latching mechanism that prevents rotation of the fire detector with respect to the base. In mounting the fire detector unit to the base, the fire detector unit is placed over the base and rotated with respect to the base. As the fire detector is rotated, the bayonet connecting terminals 7, 8, 9 of the base interface with the connecting terminals 17, 18, 19 of the fire detector unit, thereby coupling the fire detector unit to the base.⁴ Furthermore, when the fire detector unit is mounted to the base, the engaging portion 6 of the spring 3 passes over a projection 5a of the fire detector unit and is received within a recess 5b.⁵ The engaging portion 6 prevents rotation of the fire detector unit with respect to the base, thereby preventing the fire detector unit from being disengaged from the base.

The engaging portion 6 disclosed in *Koganemaru* is disengaged from an engaging portion 5 of the fire detector unit by inserting a narrow bar or the like through a part of an elongate hole in the fire detector unit. The bar deforms the spring 3, thereby disengaging the engaging portion 6 of the spring 3 from the engaging portion 5 of the fire detector unit. In this state, the fire detector unit may be rotated to disengage the bayonet connectors, thereby releasing the fire detector unit.⁶ Thus, the spring 3 and engaging portion 6 *do not release in response to positioning the fire detector unit with respect to the base.*

Koganemaru does not teach or suggest a fixture mounting system that includes a first relatively fixed part, a second part relatively movable with respect to the first part, a tool for temporarily coupling with respect to the second part, and a latch to retain the tool and second part together, *the latch releasing in response to positioning the second part with respect to the first part*, as recited in claim 30 of the present application.

Accordingly, withdrawal of the rejection of claim 30 is respectfully requested.

Claim 31 recites a latch for a mounting system and related tool wherein one member may be mounted with respect to a mount by manipulating the one member

⁴Column 3, lines 53-61 and Fig. 8 of *Koganemaru*

⁵Column 3, lines 62-67 and Fig. 10 of *Koganemaru*

⁶ See col. 4, lns. 3-19 of *Koganemaru*

using the tool. The latch includes a selectively operable retainer to retain a coupled relation of the one member and the tool, and *a release responsive to mounting of the one member to facilitate separating the one member from the tool*. As the one member is mounted to the mount, the selectively operable retainer releases, thereby releasing the latch from the tool. Thus, once the member is mounted to the mount, the tool immediately can be removed from the member, without any further action by a user of the system.

The Examiner contends that the spring 3 and engaging portion 6 of *Koganemaru* are equivalent to the latch recited in claim 31 of the present application. The Applicant respectfully disagrees with the Examiner.

Initially, Applicant notes that the Examiner has identified a fixed part 1 (the base 1), a second part 4 (the fire detector unit 4), a tool (the bayonet terminals 7, 8, 9, 17, 18, 19) and a latch 3 (the spring 3). Additionally, the Examiner states that the fixed part has a retention mechanism 6 (the engaging portion 6).⁷ The second part 4 is mounted to the fixed part 1 and held together via the alleged tool⁸, and the retention mechanism 6 prevents rotation of the second part 4 with respect to the fixed part 1, thereby preventing the alleged tool from releasing. To release the alleged tool, a separate tool, e.g. a narrow bar, is inserted into an opening of the second part 4 to deform the latch 3, thereby disengaging the retention mechanism 6. Thus, *Koganemaru* does not teach or suggest *a release responsive to mounting of one member to facilitate separating the one member from the tool*, as recited in claim 31.

Accordingly, withdrawal of the rejection of claim 31 is respectfully requested.

Claim 32 recites a latch mechanism for a mounting system in which one member is to be mounted with respect to a mount that includes a tool for manipulating the one member with respect to the mount, and a selectively operable retainer retains a coupled relationship between the tool and the one member. Additionally, claim 32 recites a

⁷ Page 2, 4th paragraph of Office Action

⁸ Applicant's position is that the Examiner's classification of the bayonet terminals as a tool is unreasonable, and one skilled in the art would not consider the bayonet terminals as a tool, but as a holding mechanism

release mechanism to release the selectively operable retainer to facilitate separating the tool and the member *in response to mounting one member with respect to the mount*.

As was discussed above, *Koganemaru* discloses that a separate tool, e.g., a narrow bar, must be used to release the spring 3.⁹ *Koganemaru* does not teach or suggest a release mechanism to release the selectively operable retainer to facilitate separating the tool and the member *in response to mounting the one member with respect to the mount*, as recited in claim 32 of the present application.

Accordingly, withdrawal of the rejection of claim 32 is respectfully requested.

ii. Claim 37

Claim 37 recites a mounting system for an electrical device that includes first and third electrical terminals, which are in a cover and a base, respectively, that generally *circumscribe an area surrounding a respective second and fourth electric terminals*, which also are in the cover and base, respectively. Thus, since the first and third electrical terminals circumscribe an area, they are continuous terminals without a gap.

The Examiner contends that *Koganemaru* discloses the elements recited in claim 37 of the present application. The Applicant respectfully disagrees with the Examiner for at least the following reasons.

As was noted above, *Koganemaru* discloses several bayonet terminals for retaining the detector unit to the detector base. In addition to providing a holding function, the bayonet terminals also provide electrical connections between the detector unit and the detector base. None of the bayonet terminals, however, circumscribe an area surrounding a respective electrical terminal. Instead, the bayonet terminals distinctly are shown as occupying separate areas of the detector unit and the detector base, and interface with a corresponding bayonet terminal in opposing member (detector unit or detector base).¹⁰ Thus, *Koganemaru* does not teach or suggest *first*

⁹ See column 4, lines. 3-9 of *Koganemaru*

¹⁰ See, e.g., Figs. 2 and 8 of *Koganemaru*, reference identifiers 7, 8, 9 and 17, 18 and 19

and third electrical terminals generally circumscribing an area surrounding respective second and fourth electrical terminals, as recited in claim 37 of the present applications.

Additionally, claim 37 recites that *at least one of the first and third terminals are operable to deform resiliently in response to urging by the other of the first and third terminals* as a base and cover are urged together. As the cover is mounted to the base, the first and third terminals of the base contact the second and fourth terminals of the cover (e.g., first and second terminals contact each other and the third and fourth terminals contact each other). At least one of the first and third terminals deform resiliently in response to connecting to the second and fourth terminals.

Koganemaru discloses a set of bayonet terminals mounted in the fire detector unit and a corresponding set of bayonet terminals mounted in the base. The bayonet terminals, in addition to providing a holding force between the base and the fire detector unit, also provide electrical connections between the base and fire detector unit.¹¹ Since the bayonet terminals provide a holding force between the base and fire detector unit, it would not be desirable to have bayonet terminals that deform in response to urging the bayonet terminals together.

Moreover, nowhere has it been shown that *Koganemaru* teaches or suggests electrical terminals that deform resiliently in response to urging the base and cover together, as recited in claim 37 of the present application.

Accordingly, withdrawal of the rejection of claim 37 is respectfully requested.

iii. Claim 67

Claim 67 recites a mounting system that includes a base, a mounting member, and a *multi-retention mechanism to hold the base and the mounting member together*. The multi-retention mechanism includes at least one mechanical attachment that is selectively operable to release and hold and operates using a positive lock. The multi-retention mechanism also includes a second attachment that is selectively operable to release and hold and operates responsive to a positional relationship. The second attachment, like the mechanical attachment, provides a holding force between a base

¹¹Column 3, lines 13-24 and lines 53-61 of *Koganemaru*

and a mounting member that tends to keep the mounting member attached to the base. *Should one attachment fail, the other attachment will hold the mounting member to the base.*¹² For example, if the mechanical attachment fails, then the second attachment will retain the mounting member to the base. Similarly, if the second attachment fails, then the mechanical attachment will retain the mounting member to the base.

Koganemaru discloses a smoke detector that includes a detector unit and a detector base. The detector unit is coupled to the detector base via bayonet terminals. For example, the detector unit is positioned against the detector base and rotated in a counterclockwise direction with respect to the detector base. As the detector unit is rotated, the bayonet terminals of the detector unit engage corresponding terminals in the detector base, and the bayonet terminals hold the detector unit to the detector base.

As the detector unit is rotated into position, a locking mechanism, which includes a spring 3/engaging portion 6 in the base, engages with an engaging portion 5 of the fire detector unit, thereby preventing rotation of the detector unit with respect to the detector base.

The spring 3 provides a force in a direction away from the base, e.g., in a downward direction A6 as shown in Fig. 10 of *Koganemaru*, and thus does not provide any force in a lateral direction, e.g., in a direction A4 as shown in Fig. 10. Any contact made between the engaging portion 6 of the spring 3 and the engaging portion 5 of the detector unit would be incidental contact. Moreover, such contact would not be sufficient to hold the detector unit to the base in the event of a failure of the bayonet connectors.

In fact, a valid argument can be made that the locking mechanism, as disclosed in *Koganemaru*, actually applies a force to the detector unit that is away from the detector base, i.e., the force tends to urge the detector unit away from the detector base.¹³ This force is due to the fact that the spring 3 provides a force in a direction

¹² See pg. 36, Ins. 23-26

¹³ See Fig. 10 and col. 3, ln. 62-col. 4, ln. 2 of *Koganemaru*

away from the base. Such a force, if it were applied to the detector unit via the engaging portion 6, would tend to push the detector unit away from the base.

Moreover, and with reference to Fig. 10 of *Koganemaru*, the engaging portion 6 is shown with a flat surface (not numbered) that, when engaged, tends to prevent rotation in the A4 direction. A flat surface mating with another flat surface, absent an extreme force in the A4 direction, will not provide a holding force to hold the detector unit to the base. Thus, the shape of the engaging portion 6 in conjunction with the downward or away force applied by the spring 3 clearly indicates that the engaging portion provides no holding force in the A6 direction. Therefore, the entire holding force between the detector unit and the base is provided by the bayonet terminals.

Koganemaru does not teach or suggest a multi-retention mechanism to hold the base and mounting ember together, including a mechanical attachment and a second attachment, both of which are selectively operable to release and hold, as recited in claim 67 of the present application.

Accordingly, withdrawal of the rejection of claim 67 is respectfully requested.

iv. Claims 81-84

Claims 81-84 have been canceled herein and, therefore, the rejection of claims 81-84 has become moot.

v. Claim 89

The Examiner has rejected claim 89 as being anticipated by *Koganemaru*. The Applicant respectfully disagrees with the Examiner for at least the following reasons.

Claim 89 recites a fixture installation and removal tool that includes a manipulator and a support member associated with respect to the manipulator. Figs. 17 and 18 of the present application illustrates an embodiment of the fixture installation and removal tool 703, which includes a manipulator, e.g., the elongated rod 720, and a support member, e.g., the decoupling arms 717. The support member supports the positional subassembly during installation and removal of the subassembly to/from the fixed subassembly. The support member includes a securement feature, e.g., grooves or notches 717a that are retainable by a latching mechanism of the positionable

subassembly, e.g., pins 753 (Fig. 21B). The latching mechanism selectively retains and releases the positionable subassembly to the support member.

More particularly, the securement feature of the support member couples to the latching mechanism of the positionable subassembly to lock the two components together. The locking of the support member to the positionable subassembly permits positioning the positionable subassembly relative to the fixed subassembly without the risk of the positionable subassembly unexpectedly releasing from support member.

Koganemaru discloses a smoke detector that includes a detector unit that is coupled to a detector base. The detector unit is secured to the detector base via bayonet terminals in the detector unit, which engage corresponding terminals in the detector base as the detector unit is rotated with respect to the detector base. Nowhere has it been shown, however, that *Koganemaru* teaches or suggests the use of an installation and removal tool to couple the detector unit to the detector base. Moreover, *Koganemaru* does not teach or suggest a fixture installation and removal tool that includes a *manipulator and a support member* associated with respect to the manipulator. Furthermore, *Koganemaru* does not teach or suggest a *support member that includes a securement feature retainable by a selectively operable latching mechanism of a positionable subassembly*. *Koganemaru* does not teach or suggest all the limitations of claim 89 of the present application and therefore the requirements of anticipation have not been met.

Accordingly, withdrawal of the rejection of claim 89 is respectfully requested.

vi. Claim 91

Claim 91 recites a positionable subassembly that includes a connection to connect the positionable subassembly to a support tool for temporary support and manipulation of the positionable subassembly. The positionable subassembly also includes a latch for securing the positionable subassembly to a support tool. The latch has an operating mechanism to release in response to a positional relationship with a relatively fixed subassembly.

As was discussed above, *Koganemaru* discloses a smoke detector that includes a detector unit that is coupled to a detector base. The detector unit is secured to the

detector base via bayonet terminals in the detector unit, which engage corresponding terminals in the detector base as the detector unit is rotated with respect to the detector base. Additionally, the Examiner has equated the bayonet terminals as being a tool.^{14 15}

Assuming for sake of argument that the bayonet terminals are a tool, the bayonet terminals in no way allow for manipulation of the positionable subassembly, as recited in claim 91. More particularly, as the fire detector unit is mounted to the base, the bayonet terminals become inaccessible, since they are sandwiched between the base and the detector unit. Thus, the bayonet terminals cannot be used to manipulate the positionable subassembly.

Accordingly, withdrawal of the rejection of claim 91 is respectfully requested.

III. REJECTION OF CLAIMS 1-5, 26 AND 33-36 UNDER 35 USC §103(a)

Claims 1-5, 26 and 33-36 stand rejected under 35 USC §103(a) based on U.S. Patent No. 3,836,766 to *Auerbach*. Withdrawal of the rejection is respectfully requested for at least the following reasons.

Independent claim 1 recites a fixture mounting structure that includes a magnetic device to hold a cover to a base, and a selectively operable mechanical retainer to provide retention of the cover to the base. A unique aspect of claim 1 is that it pertains to two retention mechanisms; the magnetic device and the mechanical retainer. One function of the magnetic device and the mechanical retainer is to operate in tandem, wherein if one device were to fail then the other device would continue to hold the cover to the base. Independent claims 33-35 also recite similar language. *Auerbach* does not teach or suggest this aspect of the claimed invention.

Auerbach discloses a light fixture that incorporates a single retention mechanism. In one embodiment *Auerbach* discloses that the single retention

¹⁴ Page 6, second paragraph of the Office Action

¹⁵ Applicant does not agree with the Examiner's position that the bayonet terminals are a tool as used in the present application. Additionally, the Applicant respectfully contends that one skilled in the art would not interpret the bayonet terminals as a tool, but as a holding mechanism, and that it is not reasonable to equate the bayonet terminals as a tool as used in the present application.

mechanism is a magnet (Fig. 12 of *Auerbach*), and in another embodiment *Auerbach* discloses that the single retention mechanism is a mechanical mechanism (Fig. 11 of *Auerbach*). Nowhere, however, does *Auerbach* teach or suggest a fixture mounting structure that includes multiple retention mechanisms. *Auerbach* merely discloses a light fixture having a single retention mechanism, and examples of retention mechanisms that may be used in conjunction with the single retention mechanism.

The Examiner contends that it would have been obvious to one skilled in the art to modify Fig. 12 to incorporate the retainer of Fig. 11. The Applicant respectfully disagrees with the Examiner.

The Examiner, in response to Applicant's previous argument that improper hindsight was used to render claim 1 obvious, states that any judgment on obviousness is in a sense necessarily a reconstruction based upon hindsight reasoning. But so long as it takes into account only knowledge which was within the level of ordinary skill at the time the claimed invention was made, *and does not include knowledge gleaned only from applicant's disclosure*, such reconstruction is proper (emphasis added).¹⁶

As was noted above, *Auerbach* does not teach or suggest a fixture mounting structure that includes multiple retention mechanisms. *Auerbach* merely discloses a single retention mechanism, and several embodiments of such a single retention mechanism. The present invention discloses a fixture mounting structure that includes multiple retention mechanisms. Interpreting *Auerbach*, which discloses a single retention mechanism, as rendering claim 1 obvious appears to suggest that knowledge was gleaned from applicant's disclosure. Such knowledge is improper and, therefore, the rejection is improper.

"The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification". *In re Fritch*, 23 USPQ2d 1780 at 1783, (Fed. Cir. 1992). "It is impermissible to use the claimed invention as an instruction manual or "template" to piece together teachings of prior art so that claimed invention is rendered obvious".

¹⁶ Page 6, 1st paragraph of the Office Action, citing *In re McLaughlin*

Id. In the present case, it appears the Examiner has used the present invention as a template to arrive at the claimed invention and, thus, the rejection should be withdrawn.

Accordingly, withdrawal of the rejection of claims 1 and 33-35 is respectfully requested.

Claims 2-5 and 26 depend from claim 1, and therefore can be distinguished from *Auerbach* for at least the same reasons.

Additionally, claim 5 further recites that the selectively operable mechanical retainer comprises a clip and a retention member. The clip is mounted to the cover and the retention member is mounted to the base.

As was noted above, *Auerbach* discloses a light fixture that includes a diffuser having key slots circumferentially spaced about a flange. *Auerbach*, however, does not teach or suggest a *selectively operable mechanical retainer that includes a clip and a retention member*, wherein the clip is mounted in the cover and the retention member is mounted in the base, as recited in claim 5 of the present application.

Accordingly, withdrawal of the rejection of claims 2-5 and 26 is respectfully requested.

Claim 36 recites a method of coupling plural members. The method includes the steps of placing a first and second member in proximity for a magnetic retainer to hold the first and second members together. Additionally, the method includes using a mechanical retainer to retain the first and second member together.

As was noted above, *Auerbach* does not teach or suggest a dual retention mechanism. Additionally, *Auerbach* does not suggest combining embodiments to arrive at a dual retention mechanism. Thus, *Auerbach* does not teach or suggest a method for coupling plural members, wherein the plural members are retained together using a mechanical retainer and a magnetic retainer.

Accordingly, withdrawal of the rejection of claim 36 is respectfully requested.

Serial No.: 10/007,509

IV. CONCLUSION

Accordingly, all pending claims are believed to be allowable, and the application is believed to be in condition for allowance. A prompt action to such end is earnestly solicited.

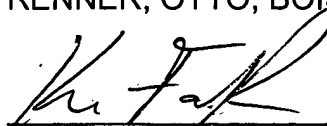
Serial No.: 10/007,509

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application, the Examiner is invited to contact the undersigned at the telephone number provided below.

Should a petition for an extension of time be necessary for the timely reply to the outstanding Office Action (or if such a petition has been made and an additional extension is necessary), petition is hereby made and the Commissioner is authorized to charge any fees (including additional claim fees) to Deposit Account No. 18-0988.

Respectfully submitted,

RENNER, OTTO, BOISSELLE & SKLAR, LLP



Kenneth W. Fafrak
Reg. No. 50,689

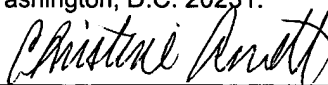
DATE: August 5, 2004

The Keith Building
1621 Euclid Avenue
Nineteenth Floor
Cleveland, Ohio 44115
(216) 621-1113

B:\Pitt\IP101USA\OfficeActionReply 5-18-04 af.wpd

CERTIFICATE OF MAILING

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited with the United States Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231.



August 5, 2004

DATE